



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

February 28, 2025

**BY ECF**

The Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Abel Rosario and Bianneury Pena, S1 24 Cr. 497 (DLC)**

Dear Judge Cote:

The Government writes respectfully to request a one-week extension of the deadline to oppose the motion to suppress filed by defendant Bianneury Pena in the above-referenced case. *See* Dkts. 34-36. Both undersigned government counsel are preparing for trial in other matters. The additional time would allow government counsel to adequately respond to Pena's motion while also addressing their pressing trial obligations. Counsel for Pena consents to this request.

Respectfully submitted,

MATTHEW PODOLSKY  
Acting United States Attorney

By: /s/ Ryan W. Allison  
Ryan W. Allison  
Ashley Nicolas  
Assistant United States Attorneys

cc: Counsel of Record (by ECF)

*G. Teal.*  
*Ashley Nicolas*  
*3/3/25*